

ATTACHMENTS SECTION "A"

(Rev. 4/97)

FORM TO BE USED BY A PRISONER IN FILING A COMPLAINT
UNDER THE CIVIL RIGHTS ACT, 42 U.S.C. §1983

UNITED STATES DISTRICT COURT
DISTRICT OF DELAWARE

SHANE K. HOPKINS

(Enter above the full name of the plaintiff in this action)

v.

CORRECTIONAL OFFICER J. PUSEY,
CORRECTIONAL OFFICER J. SMITH,
CPT J. M. MERSON,
DEPUTY WARDEN DAVID E. PERCE, JR.,

(Enter above the full name of the defendant(s) in this action)

ACHIEVE OF DELAWARE JUDITH MULLEN; DREWRY NASH FENNELL;
ATTORNEY GENERAL OF DELAWARE M. JANE BRADY

Civil ACTION No. _____

JURY TRIAL DEMAND

CLASS CERTIFICATION

I. Previous lawsuits

A. Have you begun other lawsuits in state or federal courts dealing with the same facts involved in this action or otherwise relating to your imprisonment?
YES [] NO ☒

B. If your answer to A is yes, describe the lawsuit in the space below. (If there is more than one lawsuit, describe the additional lawsuits on another piece of paper, using the same outline).

1. Parties to this previous lawsuit

Plaintiffs

N/A

Defendants

N/A

2. Court (if federal court, name the district; if state court, name the county)

N/A

3. Docket number

/ /

4. Name of judge to whom case was assigned

N/A

5. Disposition (for example: Was the case dismissed? Was it appealed? Is it still pending?)

N/A

6. Approximate date of filing lawsuit

N/A

7. Approximate date of disposition

/

II. A. Is there a prisoner grievance procedure in this institution? Yes [☒] No [☐]

B. Did you present the facts relating to your complaint in the state prisoner grievance procedure? Yes [☒] No [☐]

C. If your answer is YES,

1. What steps did you take?

FILED GRIEVANCE ONCE I WAS RELEASED FROM ISOLATION CONFINEMENT

2. What was the result?

RETURNED AS EXPIRED FILING PERIOD (SEE EXHIBIT "A")

D. If your answer is NO, explain why not

N/A

E. If there is no prison grievance procedure in the institution, did you complain to prison authorities? Yes [☐] No [☐]

F. If your answer is YES,

1. What steps did you take?

N/A

2. What was the result?

/

III. Parties

(In item A below, place your name in the first blank and place your present address in the second blank. Do the same for additional plaintiffs, if any.)

A. Name of Plaintiff SHANE K. HOGKINS #00253918
 Address 1181 Gaddick Road DCC-SM. Smyrna, DE 19977-9674

(In item B below, place the full name of the defendant in the first blank, his official position in the second blank, and his place of employment in the third blank. Use item C for the names, positions, and place of employment of any additional defendants.)

B. Defendant Capt. Pusey is employed as Corrections Officer at DCC-MHC-Smyrna, DE 19977-9674

C. Additional Defendants Capt. J. Smith Cor. Off. #2; Capt. M. Maresca
Corrections Personal; Deputy Warden DE PERCE JR.
* ACTU. of DE LAWARE DIRECTORS JUDITH MULLEN AND
DEWEY NASH FENNELLES; ** ATTORNEY GENERAL M. JANE BRADY.

IV. Statement of Claim

(State here as briefly as possible the facts of your case. Describe how each defendant is involved. Include also the names of other persons involved, dates, and places. Do not give any legal arguments or cite any cases or statutes. If you intend to allege a number of related claims, number and set forth each claim in a separate paragraph. Use as much space as you need. Attach extra sheet if necessary.)

JURISDICTION

1.) This Court has JURISDICTION OVER PLAINTIFFS
 FEDERAL CLAIMS PURSUANT TO 28 USC §§ 1331 AND
 1343(A)(3) AND ALSO STATE LAW CLAIMS PURSUANT
 TO 28 USC § 1361. CONT (X)(2) →

* ACTU. of DE LAWARE Add. is:
 100 W. 10TH ST Wilm. Del. Suite 309 -3-
 19801

** M. JANE BRADY Add. is:
 820 N. French St 11th Floor
 19801

CONT (2)

COMPLAINTVENUE

2.) The District Court of Delaware is an appropriate venue under 28 U.S.C. § 1391(b)(2) because the substantial part of the events or omissions giving rise to the claims occurred in this district.

PARTIES

3.) Plaintiff, SHANE K. HOPKINS through-out the incidents hereinunder is an inmate at the Delaware Correctional Institution as an sentenced defendant serving a valid sentence order pursuant to 11 Del. C. § 3903 at the aforesaid institution.

4.) Defendant Capt. Qusey was at all times herein employed as a correctional officer at the Delaware Correctional Institution and on November 26, 2004 did use excessive force upon Plaintiff SHANE K. HOPKINS in violation of 11 Del. C. § 468(5). And in furtherance thereof assaulted Plaintiff in violation of 11 Del. C. § 1254 by striking Plaintiff numerous times with a closed fist and ramming Plaintiff's head into a cement wall while restrained

CONT. (3)

Complaint

IN HANDCUFFS AND did CONSPIRE TO FURTHERANCE
OF THE AFORESAID, WITH ANOTHER CORRECTIONAL OFFICER
C/O J. SMITH IN VIOLATION OF 11 DEL. C. § 512-513 AND
did MAKE DIRECT THREATS UPON PLAINTIFF, IF PLAINTIFF
COMPLAINED TO PRISON OFFICIALS. ALL WHILE ACTING UNDER STATE
JAWS CODE OF CONDUCT, AND STATE CODE, COLOR OF CONDUCT.*

5.) DEFENDANT C/O J. SMITH WAS AT ALL TIMES
HEREIN EMPLOYED AS A CORRECTIONAL OFFICER AT THE DEL-
-AWARE CORRECTIONAL INSTITUTION AND ON NOVEMBER 26,
2004 did USE EXCESSIVE FORCE UPON PLAINTIFF JANE
K. HOPKINS IN VIOLATION OF 11 DEL. C. 468(5) AND IN fur-
-THENCE THEREOF ASSAULTED PLAINTIFF IN VIOLATION OF
11 DEL. C. § 1254 by STRIKING PLAINTIFF NUMEROUS TIMES
WITH A CLOSED FIST AND RAMMING PLAINTIFF'S HEAD INTO
A CEMENT WALL WHILE RESTRAINED IN HANDCUFFS AND did
CONSPIRE TO FURTHERANCE OF THE AFORESAID WITH DEF-
-ENDANT C/O J. PUSEY IN VIOLATION OF 11 DEL. C. § 512-513
AND did MAKE COMBINED DIRECTED THREATS BOWARDS PLA-
-INTIFF, IF PLAINTIFF COMPLAINED TO PRISON OFFICIALS
ALL WHILE ACTING UNDER STATE JAWS CODE OF CONDUCT AND
STATE CODE, COLOR OF CONDUCT.*

* 10 DEL. C. § 4001 THRU 4010

CONT. (X4) Complaint

(c.) DEFENDANT Col. J.M. MERSON WAS AT ALL TIMES HEREIN EMPLOYED AS A GRIEVANCE APPOINTMENT DIRECTOR AT THE DELAWARE CORRECTIONAL INSTITUTION AND ON DECEMBER 20, 2004 did deny THE SUBMISSION OF A GRIEVANCE AND did NOT PROVIDE APPEAL FORMS TO APPEAL A GRIEVANCE decision IN VIOLATION OF 42 USC § 1997 AND did CONSPIRE IN FURTHERANCE OF AN EXCESSIVE USE OF FORCE CLAIM AND KNOWINGLY MADE FALSE STATEMENTS IN THE COURSE OF ACTIONS TO PREVENT THE DISCLOSURE OF A STATE LAW VIOLATIONS AS INCORPORATED IN BOTH THE FACTUAL AND INVESTIGATORY PROCESS OF THE GRIEVANCE SUBMISSION AND ACCESS OF GRIEVANCE PROCESS OF A CLASS OF PERSONS WHILE IN ISOLATION STATUS AND did in A MANNER CONSISTANT TOWARDS PREVENTING DISCLOSURE OF ASSAULTS upon A CLASS OF INMATES IN THE SHU (SECURITY HOUSING UNITS) FROM 2001 TO DATE IN VIOLATION OF (CRIPA) 42 USC § 1997 AS A CONTINUED PATTERN OF RETECTIONS OF GRIEVANCES) SUBMITTED BY NUMEROUS INMATES IN THE SAME MANNER AS EVIDENCED IN PLAINTIFFS GRIEVANCE (SEE EXHIBIT A)

CONT Q. (5)

Complaint

7.) DEFENDANT Deputy Warden DAVID E. JOSEPH, JR., did AT ALL TIMES HEREIN EMPLOYED AS A RESPONDENT SUPERIOR OVER PLAINTIFF AND DEFENDANTS AND did ON DECEMBER 30, 2004, INSTITUTE AN INVESTIGATION INTO THE ALLEGATIONS AS CONTAINED IN EXHIBIT 'A' AND did THEREAFTER ATTEMPT IN FURTHERANCE TO PREVENT disclosure of ADVANCED CLAIMS AND REQUESTS FOR CRIMINAL CHARGES, by THE DIRECT ACTS, from 12-30-04 TO DATE, WHILE EMPLOYED AT DELAWARE CORRECTIONAL INSTITUTION AND ACTING UNDER STATE LAWS AND CODE OF CONDUCT AS RESPONDENT SUPERIOR.*

* 8.) DEFENDANT(S) AC.LU. OF DELAWARE JUDITH MULLEN ESQ. AND DREWRY NASH FENNEL AT ALL TIMES HEREIN did MAINTAIN IN file NG.02-22 NUMEROUS ALLEGATIONS OF A PATTERN OF CONTINUED ASSAULTS UPON PLAINTIFF AND NUMEROUS OTHER INMATES AT DELAWARE CORRECTIONAL INSTITUTION AND did KNOWINGLY AWARE OF PREVENT, HINDER THE DISCLOSURE OF ON-GOING CRIMINAL CONDUCT IN VIOLATION OF 42 USC § 1997 CRIPA. VIOLATIONS TO THE DEPARTMENT OF JUSTICE IN VIOLATION

(7)

*SEE EXHIBITS C'

CONT (8)

COMPLAINT

of DELAWARE RULES of PROFESSIONAL CONDUCT 8.4(d) AND WORK of FILE: 02-22 SUBMISSIONS) FOR NATIONAL FUNDING AND INVESTIGATORY PROCESS, THAT ALLOWED FOR ON-GOING, VIOLATIONS of NUMEROUS INMATES, ASSAULTS AND EXCESSIVE USE of FORCE INCIDENTS FROM 2002 TO DATE 'NOT' TO BE DISCLOSED OR INVESTIGATED BY THE STATE of DELAWARE ATTORNEY GENERAL'S OFFICE OR THE CIVIL RIGHTS DIVISION of THE UNITED STATES ATTORNEY GENERAL INVESTIGATORY PROCESS UNDER 42 U.S.C. § 1987 (C.R.A. (CIVIL RIGHTS INSTITUTIONAL PERSONS ACT) (SEE EXHIBITS D'))

9.) DEFENDANT DELAWARE ATTORNEY GENERAL M. JANE BRADY WHILE AT ALL TIMES HEREIN DENY PLAINTIFF ACCESS TOWARDS STATE LAW CLAIMS AGAINST DEFENDANTS AND DID FAIL TO RESPOND TO OR INSTITUTE INVESTIGATORY PROCESS of STATE LAW CLAIMS AGAINST DEFENDANT WHILE HOUSED AT THE DELAWARE CORRECTIONAL INSTITUTION AND KNOWINGLY AWARE OF THE AFORESAID INCIDENT FAIL TO PREVENT OR UPHOLD CRIMINAL CONDUCT of STATE ACTORS WHILE AS THE ATTORNEY GENERAL of THE STATE of DELAWARE DURING THE AFORE-

CONT (9)

Complaint

Said Time Periods of 2002 TO DATE (SEE EXHIBIT E)

FACTUAL ALLEGATIONS

10.) ON NOVEMBER 26, 2004 DEFENDANTS
C/O S. Rusey AND C/O J. Smith did ASSAULT PLAINTIFF
AS CONTAINED IN PLAINTIFF'S ATTACHED AFFIDAVIT
AS (EXHIBIT B) AND did CAUSE INJURY IN THE
PERFORMANCE OF DUTIES IN VIOLATION OF STATE
LAWS AND did make direct THREATS upon
PLAINTIFF AND did CONSPIRE AGAINST PLAINTIFF
TO STOP PREVENT OR ALLOW PLAINTIFF TO REPORT
THE INCIDENT IN A MANNER THAT displays CONTINUED
PATTERN OF ACTS AGAINST PLAINTIFF AND OTHER
INMATES IN COMBINED EFFORT THAT WAS ILLEGALLY
DONE IN VIOLATIONS OF STATE AND FEDERAL LAWS.
PLAINTIFF'S STATEMENT OF CLAIM IS IMBEDDED
WITHIN THE AFFIDAVIT AFORESAID AND WOULD
SUBMIT IT AS ALLEGATIONS OF FACTUAL CONTENT
OF CLAIMS HEREIN (AS STATEMENT OF FACTS)

11.) ON DECEMBER 17, 2004 PLAINTIFF

(9)

CONT (8)

COMPLAINT

Submitted A Grievance Related For The November 26, 2004 Incident And Contained Within The Grievance The Reasons For 'NOT' Being Able To Timely File A Grievance Within The 7 Day Time Periods Due To denial of Access by Any Inmate Who is on Isolations) Status To A Pen, Paper, Bible, Journal, Grievance Forms by The direct Actions of Defendant Col. J.M. Merson who is Aware of And is Responsible for The Grievance Process at Delaware Correctional Institution From 2002 To Date And Knowingly Aware of Other Inmates denial of Access To Grievances While Under 15 day Isolation Status As Evidenced by Plaintiffs Claims) Depend Upon Exhibit 'A' herein As Stated Therein Under. (Plaintiffs) Claims are Founded As Incorporated As Contained In Exhibit 'A' Content And Context of (Class-Action Based Claims From 2002 To Date).

12.) From 2002 To Date Both Directors of A.C.L.U. of Delaware did prevent The disclosure of on-going Civil Rights Violations To be Presented

CJT 3. (9)

Complaint

THE U.S. DEPARTMENT OF JUSTICE CIVIL RIGHTS DIVISIONS AS AN ON-GOING C.R.T.P.A. VIOLATION OF BOTH STATE AND FEDERAL LAWS.

13.) DELAWARE ATTORNEY GENERAL M. JANE BRADY did from July 2, 2005 TO DATE did NOT Respond TO ALLEGATIONS OF STATE LAW VIOLATIONS AND OR INVESTIGATORY PROCESS INTO THE ASSAULT OF PLAINTIFF.

14.) Civil Assault
PLAINTIFF REALIZES PARAGRAPHS 4-5.

15.) This is a Civil Action brought by SHANE K. HOGKINS FOR ASSAULT AGAINST CORRECTIONAL OFFICERS J. PUSEY AND J. SMITH.

16.) DEFENDANTS PUSEY AND SMITH ACTED IN CONSORTIUM TOWARDS VERBAL THREATS AND PHYSICAL ASSAULT UPON PLAINTIFF AND did SO WHILE ACTIONS COMPLAINED OF WERE DONE UNDER THE COLOR OF STATE CODE AND IN PERFORMANCE OF THEIR STATUTORY DUTIES.

11
(9)

CONT (12)

Complaint

17.) THE ACTIONS OF ASSAULT REFERRED TO IN PARAGRAPHS 4-5 WAS DONE AND WITNESSED BY POSEY AND SMITH WITH THE DELIBERATE INTENT TO CAUSE BODILY HARM AND TO FRIGHTEN PLAINTIFF. BY THE THREAT BOTH POSEY AND SMITH CREATED REASONABLE AND REAL APPREHENSION OF FEAR AND BODILY HARM IN THE MIND OF PLAINTIFF IN THAT BOTH POSEY AND SMITH PRESENTED THE ABILITY TO INFLECT ASSAULT UPON PLAINTIFF AND DID SO WITHOUT REGARD TO THE 24 OTHER INMATES WHO WITNESSED THE ASSAULT UPON PLAINTIFF.

18.) THE ASSAULT AND THREATS UPON PLAINTIFF AIDED AND ABETTED BY BOTH POSEY AND SMITH, BOTH ACTING AS AGENTS OF DEPARTMENT OF CORRECTIONS WERE WILFUL, WANTON AND MALICIOUS. THESE ACTS AND THREATS CAUSED PLAINTIFF SEVERE MENTAL ANXIETY AND EMOTIONAL DISTRESS BY PUTTING HIM IN A STATE OF FEAR AND APPREHENSION, WHICH IN TURN, HAD A SEVERELY DETRIMENTAL EFFECT UPON HIS LIFE AND GENERAL WELL-BEING AND IMPAIRED HIS ABILITY TO MANAGE HIS AFFAIRS OR BE RELEASED ON _____

CONT (13) Complaint

From SHU to MHC. Housing where both defendants are employed and near the incident of assault as stated herein happened.

Psychic INTENTIONAL INFLECTION OF EMOTIONAL DISTRESS

19.) CORRECTIONAL OFFICERS J. Pusey and J. Smith REALIZE in Paragraphs 4-5.

20.) This is an action brought by SHANE K. HOKINS AGAINST C/O's Pusey and Smith for INTENTIONAL INFLECTION OF PSYCHIC EMOTIONAL DISTRESS.

21.) Both C/O's Pusey and Smith occupied a unique position with regard to I.D.E.L. Code § 468(5) ACTED in an extreme and outrageous manner towards Plaintiff and C/O's Pusey and Smith conduct designed and intended to inflict severe emotional distress on Plaintiff and defendants was the direct and proximate cause of psychic severe emotional distress suffered by Plaintiff.

CONT 3. (12)

ComplaintCount I: Violation of Constitutional Rights
Compensatory Damages

22) DEFENDANTS ^{CO} J. Pusey AND ^{CO} J. Smith AS PLAINTIFF INCORPORATES HEREIN BY REFERENCE THE ALLEGATIONS CONTAINED IN PARAGRAPHS 4-5 THE INTENTIONAL BEATINGS OF PLAINTIFF BY DEFENDANTS PUSEY AND SMITH VIOLATED THE RIGHT OF PLAINTIFF AS GUARANTEED BY THE FOURTH, FIFTH AND EIGHTH AMENDMENTS TO THE UNITED STATES CONSTITUTION, FOR WHICH DEFENDANT OFFICERS ARE INDIVIDUALLY LIABLE.

Count II: Violation of Constitutional RightsExemplary Damages

23) DEFENDANTS ^{CO} J. Pusey AND ^{CO} J. Smith AS PLAINTIFF INCORPORATES HEREIN BY REFERENCE THE ALLEGATIONS CONTAINED IN PARAGRAPHS 4-5 THE INTENTIONAL BEATINGS OF PLAINTIFF BY DEFENDANTS PUSEY AND SMITH WHEN PLAINTIFF WAS HANDCUFFED, UNARMED AND DID NOT POSE A THREAT OF DEATH OR PREVIOUS BODILY INJURY TO DEFENDANTS, WHEN DEFENDANTS HAD NO LAWFUL AUTH-

CONT (15)

Complaint

ORITY TO USE NON-DEADLY FORCE AGAINST PLAINTIFF
 WAS DONE WITH ACTUAL MALICE TOWARD PLAINTIFF AND
 WITH WILLFUL AND WANTON INDIFFERENCE TO AND DELIB-
 ERATE DISREGARD FOR THE CONSTITUTION RIGHTS OF
 PLAINTIFF

COUNT III: VIOLATION OF STATUTORY CIVIL RIGHTS
COMPENSATORY DAMAGES

24.) DEFENDANTS Cpt. Ousey and Cpt.
 Smith AS PLAINTIFF INCORPORATES HEREIN BY REF-
 -ERENCE THE ALLEGATIONS CONTAINED IN PARAGRAPHS 4-5
 THE INTENTIONAL BEATINGS OF PLAINTIFF BY DEFEN-
 -DANTS ^{Cpt}Ousey AND ^{Cpt}Smith WHEN PLAINTIFF WAS UNARMED
 AND DID NOT POSE A THREAT OF DEATH OR GRIEVOUS BODILY
 INJURY TO DEFENDANTS OR OTHERS, WHEN DEFENDANTS HAD
 NO AUTHORITY TO USE NON-DEADLY FORCE AGAINST PLAINTIFF
 WAS DONE WITH ACTUAL MALICE TOWARD PLAINTIFF AND
 WITH WILLFUL AND WANTON INDIFFERENCE TO AND DELIBERATE
 DISREGARD FOR THE STATUTORY CIVIL RIGHTS OF PLAINTIFF

COUNT IV: CONSPIRACY TO VIOLATE CIVIL RIGHTS
COMPENSATORY DAMAGES

25.) DEFENDANTS Cpt. Ousey and Cpt.

(15)

CONJ 3. (16)

Complaint

Smith AS PLAINTIFF INCORPORATES HEREIN by REFERENCE THE ALLEGATIONS CONTAINED IN PARAGRAPHS 4-5 AND 10 DEFENDANTS RUSEY AND SMITH CONSPIRED TO VIOLATE PLAINTIFF'S STATUTORY CIVIL RIGHTS AS IN VIOLATION OF 42 USC §1983 AND §1997 FOR WHICH DEFENDANTS RUSEY AND SMITH ARE INDIVIDUALLY LIABLE.

COUNT V: ASSAULT AND BATTERY

COMPENSATORY DAMAGES

26.) DEFENDANTS CPT. RUSEY CPT. SMITH AS PLAINTIFF INCORPORATES HEREIN by REFERENCE THE ALLEGATIONS CONTAINED IN PARAGRAPHS 4-5 THE BEATINGS, VERBAL ABUSE AND USE OF NON-DEADLY FORCE by DEFENDANTS ^{cb}RUSEY AND ^{cb}SMITH WHEN DEFENDANTS WERE NOT IN IMMINENT DANGER FROM PLAINTIFF WAS WITHOUT JUSTIFICATION OR PROVOCATION WAS EXCESSIVE AND CONSTITUTES ASSAULT AND BATTERY FOR WHICH DEFENDANTS RUSEY AND SMITH ARE INDIVIDUALLY LIABLE.

COUNT VI: ASSAULT AND BATTERY

EXEMPLARY DAMAGES

27.) DEFENDANTS CPT. RUSEY AND

CONT (15)

Complaint

Plt. Smith INCORPORATE HEREIN BY REFERENCE THE ALLEGATIONS CONTAINED IN PARAGRAPHS 4-5 THE BEATINGS AND VERBALLY ABUSED PLAINTIFF IN A MANNER THAT WAS EXTREME, OUTRAGEOUS AND UNJUSTIFIED AND CAUSED PLAINTIFF TO SUFFER PHYSICAL AND NON-DEADLY FORCE AGAINST PLAINTIFF, WAS DONE WITH WILLFUL AND WANTON INDIFFERENCE TO AND DELIBERATE DISREGARD FOR HUMAN LIFE AND THE RIGHTS OF PLAINTIFF.

COUNT VII: INTENTIONAL INFLECTION OF EMOTIONAL DISTRESS
COMPENSATORY DAMAGES

28.) DEFENDANTS Plt. Pusey Plt. Smith AS PLAINTIFF INCORPORATES HEREIN BY REFERENCE THE ALLEGATIONS CONTAINED IN PARAGRAPHS 4-5 DEFENDANT Plt. Pusey AND Plt. Smith INTENTIONALLY BEAT AND VERBALLY ABUSE PLAINTIFF IN A MANNER THAT WAS EXTREME, OUTRAGEOUS AND UNJUSTIFIED AND CAUSED PLAINTIFF TO SUFFER PHYSICAL AND EMOTIONAL DISTRESS FOR WHICH DEFENDANT Pusey AND Smith ARE INDIVIDUALLY LIABLE.

COUNT VIII: INTENTIONAL INFLECTION OF EMOTIONAL DISTRESS
EXEMPLARY DAMAGES

29.) DEFENDANTS Plt. Pusey Plt. Smith

(17)
(18)

PERSONS ACTING IN CONCERT OR COOPERATION WITH THEM FROM FURTHER VIOLATING THE RIGHTS, PRIVILEGES AND IMMUNITIES GUARANTEED TO THE PLAINTIFF UNDER THE CONSTITUTION OF THE UNITED STATES OF AMERICA;

B.) GRANT COMPENSATORY DAMAGES TO PLAINTIFF IN THE SUM OF \$ 400,000.00 DOLLARS

C.) GRANT PUNITIVE DAMAGE IN THE SUM OF 2.4 Million DOLLARS.

D.) GRANT PLAINTIFF HIS COSTS OF THIS ACTION, INCLUDING REASONABLE ATTORNEY FEES.

Dated: _____ X
SHANE K. HOPKINS
PROSE PLAINTIFF
1181 Black Rd 17AL
Smymna Delaware
1997-96

I DECLARE UNDER PENALTY OF PERJURY THAT
THE FOREGOING IS TRUE AND CORRECT

X
SHANE K. HOPKINS PROS

MAY 4, 2005
ASSISTANT DEPUTY WARDEN D.R. PIERCE
MAJOR, DAVE HOLMAN

Off. Sp.

DEC Stryana - SHU - MHU UNITS

Re: GRIEVANCE # 9907 ADWATT of Inmate.

I AM REQUESTING THAT YOU NOTIFY ME
OF THE OUT-COME OF MY REQUEST-GRIEVANCE
AS TO THE ASSAULT upon my PERSON AS STATED
IN THE GRIEVANCE 9907 AND DEPUTY WARDENS
D.R. PIERCE REQUEST AT TOP OF GRIEVANCE FOR
YOU TO ASSIGN SUPERVISOR (OTHER THAN J. BOONE)
TO INVEST THE ALLEGATIONS THEREIN.
PLEASE NOTIFY ME ACCORDINGLY.

Sincerely, Yours,

X

SHANE HOOKINS
#00253918

SHU. 17A14

cc: file
cc: Colm F. Connolly, Esq.



May 30, 2005

D.W. DE. PIERCE

RE: Reply To Your Memorandum of 5-18-05

Dear Sir:

Thank you for responding to my written request ~~of~~ (ONCE AGAIN SHORT YOUR F-DATE TO DW. has NO F-DATE ON IT) RECEIVED ON 5-9-05 AS TO GRIEV # 9907 DISPOSITION I WOULD LIKE YOU TO KNOW THAT 'NO' ONE HAS SPOKE TO ME ABOUT THIS GRIEVANCE OR ANOTHER ATTORNEY GRIEVANCE # 9908 SINCE THEY WERE FILED AND I WOULD ALSO NOTE THAT I WAS DENIED ACCESS TO ANYTHING DURING THE TIME PERIOD I WAS HELD IN ISOLATION STATUS, THUS, I FILED AS SOON AS COULD OBTAIN MY PROPERTY BACK. I SAY ~~THIS~~ THIS BECAUSE IT IS A COMMON CUSTOM OR PRACTICE TO DENY ANYONE IN ISOL. STATUS A JO OR GRIEV(S).

I WOULD ALSO NOTE THAT BOP. AND C.F.R. ON GRIEV. PROCEDURE WILL SHOW THAT NO PROCESS NOW COULD BE TIMELY AS THE GRIEV(S) ARE MORE THAN 180 DAYS OLD.

PLEASE NOTIFY ME WHO'S INVESTIGATING THESE.

Sincerely,

JUNE 12, 2005

(2)

Deputy Warden
DAVID E. PIERCEDONE - SENT
6-13-05Re: Reply to your JUNE 2, 2005 Ref: Griev. # 9907
AND 9908.

Dear Sir D.W. DE PIERCE JR.

Presumptively, When you ORDERED AN INVESTIGATION ON 12-30-04, by THE AFFIXED NOTATION AT THE TOP of Griev. # 9907 you INSTITUTED A DEPRATE AND distinguishing Inquiry out-SIDE of AND INCLUDING THE PROTECTION REASONS STATED ON THE BACK of THE ORIGINAL GRIEVANCE DATED 12-20-04 BY Cph. J. M. MERSON. My Inquiry SPECIFICALLY ASKED of you WHO WAS ASSIGNED TO INVESTIGATE THE MATTER upon THE ABOVE SAID. SINCE, I'VE NOT SPOKEN TO ANYONE ABOUT THIS AT ANY POINT THUS-FAR. I WOULD REQUEST of you or MASTER DAVE ADMAN TO NOTIFY ME ACCORDINGLY.

I AM REQUESTING AN INVESTIGATION AND
CRIMINAL CHARGES HEREON.

XC:file

SINKERZELI Dues,

SHANE K. HOPKINS
00253918 SHUMALY

MAY 12 2005

WARDEN T. CARROLL
DCC - Smyrna

Re: Request to View medical file

I need to view my medical ^{file} ASTO AN INCIDENT
ON 11-25-2004 IN ORDER TO SEE WHAT WAS
DONE AND WHAT I NEED TO ASK FOR BOTH
MEDICAL AND Psy. SERVS ASTO CONDITIONS I
AM HAVING AS A RESULT. AND TO OBTAIN NAMES
TO WRITE TO IN ORDER TO ASK FOR ASSISTANCE.

X

SHANE HOPKINS
#0253918 17A/H/SH

Done 5-12

MAY 14, 2005

Colm F. Connolly, Esq.,
U.S. ATTORNEY
1007 ORANGE STREET STE 700
P.O. Box 2046
Wilmington Delaware 19899-2046

RE: REQUEST FOR CRIMINAL (R.I.P.A. INVESTIGATION
AND 5 U.S.C. § 552 FOIA*

TO: COUNSEL:

ATTACHED HEREIN IS AN INCIDENT THAT
I AM REQUESTING YOUR OFFICE CONDUCT AN INVESTIGATION
OF UNDER C.R.I.P.A. 42 USC § 1997 PROVISIONS, IN THAT
THE INCIDENT IS AN ON-GOING PATTERN OF CONDUCT THAT
IS RELATED TO FILE NO. 02-22 OF THE DELAWARE ACT.U.
BASED ON THE SAME ILLEGAL CONDUCT OF STATE OFFICIALS
UPON INMATES. I WOULD REQUEST THAT CRIMINAL CHARGES
BE INSTITUTED HEREFOR.

I WOULD ALSO REQUEST UNDER *FREEDOM OF
INFORMATION ACT REQUEST THAT YOU DISCLOSE THE NUMBER
OF ASSAULT CASES YOUR DEPT. HAS INVESTIGATED IN THE
PAST 5 YRS. THIS WOULD BE AN REQUEST FOR THE NAMES
OF VICTIMS AND CORRECTIONAL OFFICERS INVOLVED.

SHANEK HOPKINS,

X
SHANEK HOPKINS
2053918 ITALY
118 JACKSON AVE
SMYRNA, DE 19779-9679

RE: FILE NO. 02-22 (R.I.P.A. INVESTIGATION)

SHANEK HOPKINS

MAY 20, 2005

Colm F. Connolly Esq.
UNITED STATES ATTORNEY
1007 ORANGE STREET
STE 700

P.O. Box 2046

Wilmington, Delaware 19899-2046

DONE 5-16-05 ✓
W

RE: 2nd ATTEMPT AND INTERFERENCE OF ACCESS TO
ASSET A C.R.I.P.A VIOLATIONS

DEAR U.S. ATTY CONNOLLY:

ON/BEFORE 5-16-05 I
SUBMITTED THE ATTACHED LETTER TO THE JAIL LIBRARIAN
STATE PERSONAL BRIAN ENGREN FOR COPY SERVICE.,
ATTACHED TO IT WAS GRIEVANCE(S) # 9907 AND 9908
AND A 5-5-05 LETTER TO DEPUTY WARDEN D.E.
PIERCE JR, BRIAN ENGREN REFUSED TO COPY THE
AFORESAID AND THEN ON 5-10-05 I RECEIVED ALL BACK
WITH A MEMO FROM BRIAN ENGREN DENYING TO COPY
THE GRIEVANCES AND LETTER SAYING:

"LETTERS TO STAFF AND GRIEVANCES ARE NOT
CONSIDERED LEGAL PROCEEDINGS."

ON 5-10-05 I APOIN. NOTE BRIAN ENGREN, ASKING
HIM WHAT POLICY OR PROCEDURE OR CUSTOM, HE IS
APPLYING IN DENYING ME TO DOCUMENT LEGAL

ATTACHMENTS TO SUPPORT my Claims TO YOU UNDER CRIPA. ON 5-13-05 I AGAIN RECEIVED 'NO' REPLY AND THE SAME AFORESAID SUBMISSIONS BACK UNCOPIED. ~~AND~~

I HAVE THUS, INSTITUTED A COMPLAINT AS TO THE AFORESAID AND I HAVE ADVANCED THE ENCLOSED AFFIDAVIT OUT-LINING THE ENTIRE INCIDENT AND UP TO DATE PATTERN OF RETALIATORY ACTS, GESTURES AND NOW THE AFORESAID ATTEMPT TO ASERT AND NOTIFY YOUR OFFICE.

I WOULD REQUEST NOW, TO ATTACHMENT my 5-16-05 LETTER TO INCLUDE CRIMINAL ACCESS TO THE COURTS BASED ON MY UNDERLYING CRIPA VIOLATIONS AND NOW HINDERING MY ACCESS TO THE COURTS VIA YOUR OFFICE. IN WHICH, I WISH FOR AN INVESTIGATION PATTERN OF INCIDENTS DOCUMENTED IN CASE NO. 02-22 WITH THE A.C.L.U. OF DE SINCE 2002. I DEMAND THAT YOUR OFFICE CONDUCT A CRIPA INVESTIGATION AND I AUTHORIZE YOU TO OBTAIN MYEN AND OTHER INMATES SUBMISSIONS TO DE A.C.L.U. UNDER CASE NA. 02-22. THE AMOUNT OF SUBMISSIONS

CONTAINED THEREIN UNDER 'WOULD' WARRANT A
 FEDERAL INVESTIGATION AND I WOULD ALSO QUESTION
 ALSO AS TO FEDERAL CIVIL R.C.O. VIOLATIONS ATTACH
 TO THESE INCIDENTS BY PRIVATE AND STATE ENTITIES
 OVER THE PAST 4 YEARS. UPON NOTIFICATION FROM
 YOU I WILL ADVANCE MY GRIEVANCES AND OTHER
 DOCUMENTATIONS TO SUPPORT MY CLAIMS FOR
 SAID. AND ASK THAT YOUR OFFICE CONSIDER THE AFORESAID
 THANK YOU FOR YOUR PROMPT ATTENTION THE
 AFORESAID.

Sincerely,
 [Signature]

X

XC: file

CC: Hon. M. JANE BRADY

DREWRY NASH FENNEL ESP.

SHORT. J. G. DICK

JANET EBAN ~~ESP.~~ DIR. D.C.S.

ATTACHMENTS 2 () PAGE AFFIDAVIT OF CRIM. VIOLATIONS
 AND 5-16-05 JETTER
~~AND 5~~
 () ? ↑
 once you do affidavit
 Add Page Numbers
 AMOUNTS HERE.

JUNE 20, 2005

RE DAVE

1) RE COPY - This 6-20-05
JATTAS

Colm. F. Connolly Esq.

Re: ATTACHED JATTAS / COPIES

2) Send back to me
So I can mail out to
Colm. And Watch the
Books fly!

3) Send BOTH B/TO ME

Dear Sir:

I WANT YOU TO SEE THE AMOUNT OF TIME
IT TOOK BETWEEN WRITING MY FIRST LETTER TO YOU TO
THE ABOVE DATE AND I WANT YOU TO KNOW:

1.) BRIAN ENGLISH OF THE JAIL LIBRARY
HERE DID UPON NOTING MY COMPLAINT WAS RELATIVE
TO AN ASSAULT upon my PERSON did

A.) START A Campaign of delays demands
AND OUT-RIGHT RETALIATORY NEXUS TO ASSET THESE TO YOU.

B.) HAS ON-GOING OF RETALIATORY ACTS FOR
MY EVEN ATTEMPT TO TELL YOU ABOUT ETC OF THESE
ACTS.

I WOULD HOPE THAT YOU CAN MAKE A COPY OF
THIS ABOVE 6-20-05 AND RETURN TO ME WITHIN
7 DAYS RECEIPT OF THE RECEIVING JAIL MAILING I
AM SENDING VIA ANOTHER INMATE SO I KNOW IT GETS
TO YOUR OFFICE AND WHEREUPON YOU CAN REPORT
ACCORDINGLY.

Sincerely,
X

cc: file

cc: ACTU of DE
MARIE BRADY
MARIE A. O'Rourke Esq.

U.S. DEPT. JUSTICE (WASHINGTON)

Shane Hocking

August, 2005

Colm V. Connolly Esq.
U.S. ATTORNEY
1007 ORANGE ST. STE 700
Wilmington, Delaware 19899-

RE: ATTACHED 2ND NOTIFICATION AND CRIPA INVESTIGATION

Dear Sir:

On 6-20-05 I mailed to you the enclosed filings. I've NOT heard from you and my family contacted your office and was told 'NO' Certified mailing had been received by your office.

I AM AGAIN ENCLAVING AND MAIL BY CERTIFIED MAIL THE SAME INFORMATIONALS IN ORDER TO OBTAIN A DISPOSITION INTO MY CRIPA VIOLATIONS INVESTIGATION REQUEST AFORESAID.

THANK YOU FOR YOUR ATTENTION IN THE MANNER HEREIN.

XC file
cc: MARIE A. O'DOURKE Esq. U.S. DIST. CT. DC.
ATTACHMENTS: (5) MAILINGS

Sincerely,
X

SHANE HOPKIN
#00253918 ITALY
1181 PADDLE
SMYRNA, DE 19897
967

~~CONFIDENTIAL - PASSPORT DENIED~~

November 18, 2005

Colm F. Connolly, Esq.
U.S. ATTORNEY FOR DELAWARE
1007 ORANGE STREET STE. 700
P.O. BOX 2046
Wilmington, Delaware
19899-2046

Do You HAVE MY
PHOTOCOPY? WELL
THEN GUESS WHAT
ASSHOLE I MUST
HAVE FUCKING DID
IT THEN Huh

Re: 2ND REQUEST

DEAR COUNSEL:

SINCE, I HAD A VISIT ON, 10-4-05
BY FBI. AGENT B. WISE, I'VE WRITTEN YOU, TO REQUEST
A COPY, OF THE AGENTS REPORT. SUBMITTED TO
YOU AS TO THE INVESTIGATORY PROCESS UNDER
CRIPA. ENCLOSED, I WOULD ATTENDUM THE
REPORT FINDINGS WITH THE ATTACHED 2 AFFIDAVITS
I DONE THREE FROM. PLEASE FORWARD ME A COPY
OF THE AGENTS REPORT OR FORWARD THIS TO THE
AGENT TO RESPOND HERE FORTH.

KC: FILE
CC: AGENT BRENDA WISE, FBI. OFFICE WILM DE
ATTACHMENT(S): 2 AFFIDAVITS
Sincerely,
Kues,

X
SHANE K. HOPKINS
#00253918 MAIL
1181 GARDEN ST
SMYRNA, DELAWARE
19977-9615

1 DECEMBER 27, 2005

Colm F. Connolly, Esq.,
U.S. ATTORNEY FOR DELAWARE
1007 ORANGE STREET STE. 700
P.O. Box 2046
Wilmington, DELAWARE 19899-2046

RE: 3rd Request: for Agent Wise Investigatory Report

Dear Counsel Connolly:

I HAVE 'NOT' BEEN RESPONDED
TO AS TO THE ATTACHED LEGAL MAILINGS REQUESTING
A COPY OF THE REPORT OF FBI AGENT B. WISE
DONE ON MY ASSAULT. PLEASE CHECK YOUR RECORDS
ACCORDINGLY.

THANK YOU FOR YOUR TIME AND HAVE A HAPPY
NEW YEAR.

XC: file

CC: FBI AGENT B. WISE
CLERK U.S. DIST. CT. D. Del.
ENCLOSURES: 5 PAGES

Sincerely,
Shane K. Hopkins

X
SHANE K. HOPKINS
#05253918 / 1A14
1181 GADDOCK RD.
SMYRNA, DELAWARE
19977-9611

OUT NO DATE HERE

Clark Ron
 U.S. District Court
 844 King STREET Lock Box 18
 Wilmington, Delaware 19801

RE: HOPKINS V. CUSEY, ETAL., C.A. No. _____

DEAR CLARK:

ENCLOSED, ARE SERVICE COPIES AND
 285 MARSHALL FORM(S) FOR PERSON(S) NAMED IN
 THE ORIGINAL COMPLAINT.

I WOULD ASK THE COURT TO EXCEPT
 THE ENCLOSED MAILED TO THE COURT BY ANOTHER
 INMATE DUE TO THE NATURE OF THE CONTENT AND
 ALLEGATIONS CONTAINED THEREIN UNDER AND THE MAILING
 IS DONE IN THIS MANNER, IN ORDER TO ASSURE THE
 COURT'S RECEIPT THEREOF.

THANK YOU FOR YOUR ATTENTION IN THE MANNER
 HEREIN.

XC: FILE DATED: _____

ATTACHMENTS: (7) COMPLAINTS SET(S)
 (7) 285 MARSHALL FORM(S)

Sincerely, _____

X

SHANE K. HOPKINS
 #00253918 MAIL-4
 1181 JACKSON RD
 SMYRNA, DELAWARE 19886

December 5, 2005

Clerk Ron
U.S. District Court
844 King St Lock Box 18
Wilmington, Delaware 19801

Re: Enclosed Filing and Request to docket
and return to me Cover Page of
Complaint as Receipt.

Dear Clerk:

Please allow this to be sent
by another I'm due to the nature of the
Complaint - and the fact that I don't
want to send it in my name due to
fear of it not getting to the court.

I have enclosed a cover page marked
in a pre-stamped env. and I would ask
that you time stamp it in and return it
to me in the pre-add. env. and please
add the case no. assigned.

Thank you for your time herein.

xc: file

Attachments: 1 original Complaint

1 Cover Sheet origin.

1 Informa Prep 9213

1 Pre-stamped env.

w/cover Complaint to
Time Stamp in.

Sincerely, Yours,

SHANE K. HOPKINS
#00253918 17ALH
1181 Packlock Rd
Somers, Delaware
19977

December 5 2005

Clerk
U.S. District Court
844 King St. Jack Box 18
Wilm, DE 19801

- Both
- (1) Rewrite
 - (2) Sign ^X Date 12/5/05
Complaints lost
Page.

Re: Enclosed filing

- (3) Return ALL TO
ME BY SUN EVE.
TO MAIL OUT.

Dear Clerk:

Enclosed, Please find AN ORIGINAL
AND (1) ONE COPY of which I WANT TIME
STAMPED in of COMPLAINT WITH Informa
PAPERIS WAIVER of lost application.

PLEASE TIME STAMP IN AND RETURN
TO ME MY COPY STAMPED (Time Stamped)
FRONT PAGE AS EVIDENCE of YOUR RECEIPT
of my filing.

DUE TO THE NATURE of the proceeding
I AM Sealing this by another I'm sure I know
IT WILL NOT BE TAMPERED WITH.

Thank you for you time for the Enclosed

Sincerely,
Shawna K. Hopkin

Xc:file

ATTACHMENTS: 1 ORIGINAL COMPLAINT
1 ORIGINAL COVER SHEET
1 IN Informa PAPERIS APPLICATION 1181 AALOCK Rd
1 RETURNED COPY - Please to TIME STAMPED SHAWNA, DE 1997.

JANUARY 17, 2006

Clerk
 U.S. District Court
 844 King St Jack Box 18
 Wilmington, Delaware 19801

Re: Hopkins V. Pusey, ETAL., C.A. No. 1:05-CV-870 SLR.

Dear Clerk:

Enclosed is an "Amended" Informa
 Paperis Application, Pursuant to The Court's
 Order of January 2, 2006, Also I Am Requesting
 That The Court Send me a Copy of The
 Docket And I've Also Enclosed my 28 USC
 636 TO FORWARD TIME STAMPED BACK TO
 ME SO I CAN Later Send To Counsel
 For Defendants Once An Entry of Appearance
 Has Been Effected. I've Enclose A EXTRA
 Copy for The Court's file.

LAST, I would Ask for AN Application
 or for Submission of my Case To The Civil
 Panel for Appointment of Counsel.

Thankyou for Your Time

Sincerely Yours,

Xc: file

ATTACHMENTS: 1 AMENDED Informa
 128 USC § 636 TO RETURN
 TO ME TIME STAMPED IN
 128 USC § 636 TO RETURN

X
 SHANK. Hopkins
 #00 - 12 AM 4
 128 USC § 636 TO RETURN

July 2, 2005

DOVE 7-3-05

Hon. M. JANE BRADY
DELAWARE ATTORNEY GENERAL
820 N. French ST. 12TH Floor
Wilmington, Delaware 19801

RE: ATTACHED AND Request for INTERNAL INVESTIGATION (Crim)

DE ATTY GEN BRADY:

The Deputy Warden* has MEMOS
GRIEVANCES ETC. RELATIVE TO THE ATTACHED INCIDENT
of Criminal Conduct AGAINST my Person AND ON-GOING
CRIPA VIOLATIONS AT SHU-MHU. AT DEC-Smyrna.

I AM REQUESTING THAT SOMEONE FROM DEL.
ST. POLICE CONTACT ME HERE-PORT AND THAT AN STATE
INDEPENDENT INVESTIGATION IS CONDUCTED** I HOPE TO
HEAR FROM YOU WITHIN 30 days here-PORT.

Shane K. Hawkins,

xc: file

ATTACHMENTS (4)

* DE. PRICE, JR.

** D DEL C. S 4001 TO 4010

X
SHANE K. HAWKINS
0253918 17444
1181 Chaddock Rd
Smyrna, Delaware
PM 9/7

July 2, 2005

Del. Accu. of Del. ✓
+ BREWERY NASH + TENNELL ESQ.
RE: ATTACHED

DAVE
7-2-05

I Would like To Address The Reason Why
These Materials / Letters Have Taken So Long To Get
To You. Its Very Simple BRIAN ENGLISH LAW LIBRARIAN
OCC: SHU. TRIES TO STOP, PREVENT, HANGERS, Delay
filings by delayed Withholding of legal filings for
Weeks At A Time.

Please Note The Addressed And Assign Me
An Attorney From The Delaware Division or Washington
DC Division To Handle These Matters Henceforth
And I Need The Current Address of The former
+ Delaware Accu. Del. Judith Mullen ESQ. Where She
Can be Reached And I would Ask of Your Office
The pressing Issues Present for U.S. Attorney's
CRIPA Violation Investigation in to my Assault.

Thankyou for Your Assistance in The Addressed.

Sincerely Yours,

XC: file
ATTACHMENTS (4)

X
SHANE K. HOPKINS

DECEMBER 14, 2005

John J. Reed Esq.,
ATTORNEY AT LAW
EDWARDS + ANGELL LLP
1100 NORTH MARKET STREET
SUITE 1200
WILMINGTON, DELAWARE 19801-1246

RE: Request for Submission before Federal Civil Panel

DEAR COUNSEL:

ATTACHED HEREIN WAS FILED ON 12-5-05
AND I WOULD ASK THAT YOU SUBMIT THIS TO THE
CIVIL PANEL, FOR THEIR REVIEW AND CONSIDERATION
FOR REPRESENTATION HENCEFORTH.

THANK YOU FOR YOUR TIME AND HAVE A NICE HOLIDAY
SEASON.

KC: file
cc: CLERK U.S. DISTRICT COURT (D. Del.)
ATTACHMENTS) 3 COPIES OF COMPLAINT
ONE FOR EACH MEMBER
OF THE PANEL.

Sincerely,
Yours,

X
SHANE K. HOGKINS
#00253918 17ALM
1181 GADDOCK RD.
SMYRNA, DELAWARE
19977-965

1 DECEMBER 27, 2005

AGENT BRONHA WISE
FEDERAL BUREAU OF INVESTIGATION
920 N. KING STREET STE 104
WILMINGTON, DELAWARE 19801

RE: 3RD REQUEST: FOR COPY OF INVESTIGATIVE REPORT

DEAR AGENT WISE:

I HAVE NOT RECEIVED A REPLY
TO MY PREVIOUS REQUESTS, PLEASE REVIEW
AND PROVIDE SAME. I WOULD ALSO ASK OF
YOU TO PROVIDE ME WITH COPIES OF ALL INVES.
REPORTS DONE ON D.C. - SMYRNA IN THE PAST
3 YRS ON ASSAULTS UPON INMATES BY CORREC-
TIONAL OFFICERS.*

THANK YOU FOR YOUR TIME IN THE ABOVE SAID.

XC: file

CC: Colm F. Connolly ESQ.
CLERK U.S. DIST. CT. D. Del.

ENCLOSURE(S): 5 PAGES

*THIS IS A 5 U.S.C.A. § 552 FOIA REQUEST
ADDITIONAL TO MY CASE.

SINCERELY YOURS,

SHANE K. HOPKINS
#00253918 ITALY
1181 JACKLOCK RD
SMYRNA, DELAWARE
PPM-96

JANUARY 16, 2006

RECEIVED

JAN 20 2006

Michael J. Sensor Esq.
ATTNY AT LAW
P.O. Box 1568
Wilmington, Delaware 19899-1568

Re: ATTACHED AND REQUEST FOR REPRESENTATION

Dear Counsel:

I would ask you to review the enclosed and consider taking my case in that my case shows and connects a pattern of INEQUANT acts that are of the same nature as the Wilson case. What's more not only will you get a (mass action) based lead client all of the other 50+ inmates who filed up under 02-22 w/ACTU. will also become clients.

Thank you for your time in the manner aforesaid and notify me accordingly.

vc: file
ATTACHMENTS (1) Complaint

NOTE: I'm sending via another
you to save on postage...

X Shane Hopkins
SHANE K. HOPKINS

Sincerely,
Shane K. Hopkins

X Shane Hopkins
SHANE K. HOPKINS
#00253918 17AL4
1181 Paddock Rd
Somers, Delaware
19970-9111

JANUARY 24, 2006

STEPHEN A. HAMPTON ESQ.
GRADY & HAMPTON H.C.
6 NORTH BRADFORD STREET
DOVER, DELAWARE 19904

Re: ATTACHED AND REQUEST FOR REPRESENTATION

DAR Counsel:

PLEASE REVIEW THE ATTACHED COMPLAINT
AND NOTIFY ME OF YOUR INTENT TO EXCEPT MY
CASE FOR REPRESENTATION. I HAVE ALSO ENCLOSED
FOLLOW-UPS FILED BEYOND THE 12-15-05 DOCKETING COMPLAINT.
THANKYOU FOR YOUR TIME AND CONSIDERATIONS HEREIN.

KC: file

ATTACHMENTS: (1) COPY COMPLAINT 05-870
(1) 10-20-05 AFF. DAVIT
(1) 11-18-05 follow-up
(1) 12-27-05 3rd Reg.
(1) 1-24-06 AFF. DAVIT

Sincerely, Yours

SHANE K. HOPKINS
#00253918 17ALH
1181 Paddock Rd
SMYRNA, DELAWARE
19977


JANUARY 17, 2006

MICHAEL SENSOR ESQ.
ATTNY AT LAW
FIRST FEDERAL PLAZA
STE. 560
WILMINGTON, DELAWARE
19899-1568
RE: ATTACHED

RECEIVED
JAN 20 2006

DEAR COUNSEL:

I AM AN INMATE PARALEGAL II AND
I AM IN THE UNIT THAT JAMAR WILSON WAS IN.
SINCE THE 12-2-05 ARTICLE IVE ATTEMPTED
TO GET YOUR ADD. AND PUT TOGETHER SOME MATERIALS
THAT HAVE A PARALLEL THAT SHOULD NOT BE OVER-LOOKED
BECAUSE THEY REPRESENT THE ON-GOING INSUBORDINATE
ACTS THAT CONTRADICT ANY DEFENSE THE STATE CAN
PRODUCE AGAINST WHY YOUR CLIENT DIED. NAMELY
CP GARDENS AND OTHERS WERE MOVED OUT OF THAT
UNIT A DAY AFTER THE INCIDENT., WHAT IS MORE THE
KEY TO YOUR ENTIRE CASE WILL BE THE COMPUTER LOG-
OUTS OF THE PHONE PUNCHES MADE, THAT AND 79A/R
341210 WILL ALLOW YOUR PICTURE TO BE MORE

(OVER) 

Clear And The Actual Issue is what's been
 surreptitiously documented since 2002
 when I'm were beaten up by Guards.

I will close with one thing a 90
 Buddy of myen know's what happen that
 day And I'm's STATEMENTS Given TO Police
 don't believe A word. Why! Cause If You
 get All of The Enclosed, I will be out on
 2-16-06 level IV AT Dover level IV MCI Inst.
 And I will be going INTO A law firm IN
 JUNE MAY OR JUNE 2006 AND I WANT, HAVE
 RETAIN FILES, Exhibits ETC, THAT WILL ALLOW
 SOME SERIOUS litigations TO be filed.
 Notify me Accordingly

xc: file

ATTACHMENT: (1) 1-13-06

LETTER TO ACTU.

(1) AFFIDAVIT

(1) REFERRAL CASE
 FOR REP. (NOTE)
 PLEASE Respond TO
 MR HOPKINS

Sincerely yours,
 [Signature]

RONALD E. PROCTOR JR.,
 #00163750 17AUS
 1181 Beldock Rd
 Smyrna Delaware
 19977-961

DONE SENT FOR COPIES
8-9-05 ✓

AUGUST 12, 2005

DREWRY NASH FENNEL ESQ.,
EXECUTIVE DIRECTOR
ACLU OF DELAWARE
100 WEST 10TH STREET SUITE 309
WILMINGTON, DELAWARE 19801

RE: SUBMISSIONS AND NON-REPLIES TO SPECIFIC QUESTIONS

DEAR COUNSEL:

ON 6-13-05 I WROTE YOU CONCERNING 02-22
FILE SUBMISSIONS, YOU DID NOT RESPOND TO MY REQUEST
OF THE CURRENT STATUS THEREOF AND YOU DID NOT PROVIDE
ME WITH COPIES OF PREVIOUS SUBMISSIONS OR WHAT
FOLLOW-UPS WERE DONE IN RELATION THERETO.

ON 7-2-05 I WROTE CONCERNING THE CURRENT
ADDRESS OF JUDITH MULLEN ESQ. WHOM YOU REPLACED
IN 2004, YOU DID NOT RESPOND TO MY REQUESTS, BUT
IN A VARIANCE SUBORDANT'S REPLY ON 7-13-05, WHICH
TOTALLY WAS NON-RESPONSIVE TO ANY OF MY 7-2-05
QUESTIONS) PRESENTED THEREIN UNDER

WITHIN 15 DAYS OF RECEIPT OF THIS LETTER I
WOULD REQUEST YOU, NOT TO REPLY TO MY ISSUES PRESENTED
IN MY PAST SUBMISSIONS AFORESAID. YOUR FAILURE TO DO SO
WILL RESULT IN A COMPLAINT AGAINST YOU WITH THE O.D.C. YOU
ARE PLAYING GAMES WITH PEOPLE'S LIVES AND HAVE INCURRED
NUMEROUS DEL. RULE PROFESSIONAL RESPONSIBILITY CODE OF
(1/8/05)

Forwarding Service Requested

Ron Proctor JR
Ste 17au5
1181 Paddock Rd
Smyrna, DE 19977

Reflects payments through 07/28/05

*** BILLING SUMMARY ***

Amount Due	\$	7.95
Credit on Account		
Total Amount Due	\$	7.95

Please pay by 08/07/2005

THIS IS A BILL

To keep your coverage in force, please pay your premium by the due date.

Policy/Membership Number	Insured Name	Type of Coverage	Payment Mode	Coverage From	Period To	Amount Due
039L-9NL0	Ron Proctor JR	Health Plan	Monthly	08/07/05	09/06/05	\$7.95

Thank you for purchasing additional coverage. This is the premium due for your new coverage.

Conduct VIOLATIONS THAT will be PRESENTED ACCORDINGLY
AND Vigorously PROSECUTED both STATE AND FEDERAL
CIVIL RICO. VIOLATIONS.

THANKyou for Your PROMPT ATTENTION IN THE
MANNER HEREIN.

XC: file
S.M.F. Connolly REG. U.S. ATTY.

MAILED: _____ REGISTERED MAIL

Sincerely, Dues

X
SHANE K HOOKINS
#50 - TRAM
1181 Paddock Rd
SMYRNA, DE 19977

For customer service inquiries or to start an Easy Payment Plan by using your credit card or checking account, please call 1-(800) 667-6914. General correspondence should be sent to Customer Service, PO Box 1343, Valley Forge, PA 19482-1343

DETACH HERE

RETURN THIS PORTION WITH YOUR PAYMENT-PLEASE MAKE SURE OUR COMPANY ADDRESS
APPEARS IN THE ENVELOPE WINDOW

Ron Proctor JR
Ste 17au5
1181 Paddock Rd
Smyrna, DE 19977

Policy/Membership number(s): 039L-9NL0

AMOUNT ENCLOSED

Amount Due:

\$7.95

Make check payable to:
Peoples Benefit Services, Inc.

COMPLETE BELOW FOR CHANGE OF ADDRESS

Peoples Benefit Services, Inc.
P.O. BOX 830020
Baltimore, MD 21283-0020

100003190567544303010000000000079501

In The United States District Court
For The District of Delaware

Share K. Hopkins
Plaintiff,

v.
John Pusey et al
Defendants

C.A. No. 05-870-SLR

MOTION FOR APPOINTMENT OF COUNSEL

Comes now Plaintiff Share K. Hopkins
In The Above styled Cause Pursuant To 28 USC
§ 1915(e)(1) TO APPOINT COUNSEL IN Foregoing Proceeding
that would therefore show:

1.) This action is now ripe for
appointment of Counsel due to the ability
of Plaintiff to prosecute the case at bar

OVER

(2)

Due to Plaintiff's ^{INCARCERATION} ~~CURRENT~~ ~~STATUS~~ AND
 Ability to prosecute this case in both responsiveness
 to the proceeding in both discovery and
 pretrial preparations, in which Plaintiff's
 cost turns onto the merits of the action
 that is "Class Certification" ^{"Fed. Rule Civil Procedures Rule 23"} and ability to
 dispose of witnesses and present a coherent
 claim that only a jury can resolve based
 upon the current pleadings filed by the
 counsel for defendant on May 26, 2006 ^{see exhibit "A"}

2.) This action is a Class Certification
 against both the State of Delaware and
 the A.C.L.U. (American Civil Liberties Union) the
 issues are both Class Certification and on-
 going 42 USC § 1991e (C.R.I.T.A. violations that
 currently bring a part of the federal
 inquiry conducted by the U.S. United
 States Department of Justice Civil Rights
 Division. ^{see} Exhibits B)

3.) Plaintiff is indigent and unable
 to afford counsel (see exhibit "P")

(3)

4.) Plaintiff's Imprisonment will greatly limit his ability to litigate. The issues involved in this case are complex and will require significant research and investigation. Plaintiff joined access to the law library and currently has incurred retaliatory Nexus to these proceedings by the law librarian Brian Engren who has mirrored the proceedings and instituted incidents that present a denial of access to these current filings. See Exhibits ^{"D"}~~B~~

5.) A trial in this case will likely involve conflicting testimony and counsel would better enable Plaintiff to present evidence and cross examine witnesses and maintain/hold or have possessionary control of other inmates' affidavits, exhibits etc. due to Dept. of Corrections policies

OVER

6.) Plaintiff is currently still being held in Administrative due to Classification decisions relative thereunder. (See exhibit ①) "E"

7.) The foregoing are factors listed in Montgomery v. Pinchak 294 F.3d 492, 499 (3rd Cir 2002.)

Wherefore Plaintiff submit this action for review for appointment of Counsel before the Civil Review Panel henceforth

Respectfully,

Dr. [Signature]

X
Shane F. B. [Signature]

P.S. don't forget to do
CER. RIGHTS OF SERVICES
ON. DEPT. OF JUSTICE
AND ACLU.